

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DR. BRIMA SYLLA et, al.

No.: 23-CV-05261

Plaintiffs,

-against

AMAZON LABOR UNION et. al.

Defendants.
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AFFIRMATION OF JEANNE MIRER

I, Jeanne Mirer hereby declare under the pains and penalties of perjury:

1. At the time this case was filed, I was attorney of record for the Defendants Amazon Labor Union (ALU) and Christian Smalls President of the ALU.
2. This case was dismissed on November 22, 2024, after the terms of the settlement which was entered as a consent order were fulfilled, subject to Plaintiffs' attorney filing for attorney's fees.
3. Mr. Schwartz filed for attorney's fees on March 24, 2025.
4. On April 13, 2025 I filed a request for an extension to file an opposition to Mr. Schwartz's motion for attorney's fees.
5. In that request for extension, I stated that because of the change in leadership of the union, I had not been asked to represent the union on Mr. Schwartz's attorney fees and that I was informed by the Teamsters General Counsel that the president of the local did not know that Mr. Schwartz had filed for fees.
6. On April 21, this Court granted my request for an extension until May 5, 2025.

7. The Court reminded me that although I had not been asked to represent the local union in opposition to the motion for fees, I had not filed a motion to withdraw nor had any other attorney appeared for the Union.
8. Consistent with this Court's order I forwarded the Court's order to Mr. Connor Spence, President of ALU-IBT Local 1, and the General Counsel for the Teamsters, Mr. David Suetholz. I also emailed Mr. Spence a copy of the letter I wrote asking for the extension.
9. I followed this up with discussions with Mr. Spence and Mr. Suetholz.
10. As a result of these discussions, I was informed today that I would be representing the union and Mr. Smalls in this matter and will file opposition to the motion for fees on behalf of both Defendants. I will not need to file a motion to withdraw from representing the union.

April 23, 2025



Jeanne Mirer